

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
WILKES-BARRE DIVISION**

<b>IN RE:</b>	:	CHAPTER 7
CATALINA RODRIGUEZ PEREZ	:	
aka CATALINA RODRIGUEZ	:	CASE NO.: 5:21-BK-01128-MJC
aka CATALINA AMARO AND	:	
THOMAS AMARO, III	:	
aka THOMAS AMARO	:	
	:	
	:	
Debtors	:	
~~~~~	:	CHAPTER 7
CAPITAL ONE AUTO FINANCE,	:	
A DIVISION OF CAPITAL ONE, N.A.,	:	<b>LOCATION:</b>
Movant	:	U.S. Bankruptcy Court
	:	Middle District of Pennsylvania
vs.	:	197 South Main Street
	:	Wilkes-Barre, PA 18701
CATALINA RODRIGUEZ PEREZ	:	
aka CATALINA RODRIGUEZ	:	
aka CATALINA AMARO AND	:	
THOMAS AMARO, III	:	
aka THOMAS AMARO	:	
	:	
Respondents	:	
and	:	
	:	
ROBERT P. SHEILS, JR.	:	
	:	
Trustee	:	

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**ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

**NOW COMES** Trustee, Robert P. Sheils, Jr., Esquire, by and through his attorneys,  
Sheils Law Associates, P.C., and answers the Motion of Capital One Auto Finance, for  
Automatic Stay, as follows:

1. Admitted.
2. Admitted.
3. Denied. After reasonable investigation, Trustee is without sufficient knowledge  
or information to form a belief as to the truth of the averment in Movant's paragraph eight and

strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors currently scheduled for December 17, 2021.

4. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph 4 and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

5. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph 5 and strict proof thereof is demanded.

6. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph 6 and strict proof thereof is demanded.

7. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph 7 and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

8. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph 8 and strict proof thereof is demanded.

9. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph 9 and strict proof thereof is demanded.

10. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph 10 and strict proof thereof is demanded

11. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph 11 and strict proof thereof is demanded.

12. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph 12 and strict proof thereof is demanded.

**WHEREFORE,** Robert P. Sheils, Jr., Esquire, Chapter 7 Trustee, respectfully requests this Honorable Court deny Movant's Motion for Relief until after the 341 meeting of creditors currently scheduled for December 17, 2021.

Dated: December 6, 2021

/s/ Jill M. Spott  
Jill M. Spott, Esquire  
Attorney for Trustee  
108 North Abington Road  
Clarks Summit, PA 18411  
(570) 587-2600 – Telephone  
(570) 585-0313 - Facsimile